

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

RONALD C. TATUM,	)	
	)	
Plaintiff,	)	
	)	Case No. 21-cv-06732
v.	)	
	)	Judge Sharon Johnson Coleman
10 ROADS EXPRESS, LLC,	)	Magistrate Judge Beth Jantz
	)	
Defendant.	)	JURY DEMANDED

**AMENDED SCHEDULE 5(a): PLAINTIFF’S EXHIBIT LIST**

Plaintiff, RONALD C. TATUM, by and through his attorneys, lists the following Exhibits that he may use to question witnesses on and/or seek to introduce into evidence at the trial in this matter, as well as his demonstrative exhibits.

Exhibit No.	Description	Objection	Response
1.	Caitlin Ellis 10-26-2020 Termination Letter. DEF 21.	None.	
2.	10 Roads Express Employee Handbook (10-01-2020). DEF 351-385.	None.	
3.	10 Roads Express 10-27-2020 Employee Separation Notice. DEF 20.	None.	
4.	10-26-2020 Emls re: “RON TATUM – RESIGNATION.” DEF 807-809.	None.	
5.	10-27-2020 Emls re: “I didn’t quit or retire as rumors Fly.” DEF 810-811.	None.	
6.	10-24 to 27-2020 Emls re: “Melt Down.” DEF 812-814.	None.	
7.	Tatum 10-24 and 25-2020 Emls re: Melt Down. P 1-4.	None.	

Exhibit No.	Description	Objection	Response
8.	Tatum-Natelborg 10-24 and 25-2020 Texts. EEOC 155, 157.	Object only to Plaintiff's handwritten notes on document.	No basis for obj given.
9.	Tatum Mobile Phone Calls 10-24-2020. EEOC 156.	Rule 402-Relevance; Rule 802-Hearsay; objection to handwritten notes.	Would agree to redact all except Richard Patterson calls and related notes; not H/S per 801(d); no basis given for obj to notes.
10.	Tatum-Gino Prestia 10-27-2020 Texts. P 10.	None.	
11.	Gino Prestia 11-02-2020 Statement. DEF 17.	None.	
12.	Jeff Natelborg 11-02-2020 Statement. DEF 18.	None.	
13.	Richard Patterson 11-03-2020 Statement. DEF 19.	None.	
14.	Dr. Lydia Edokpayi Aluyi, Franciscan Health Olympia Fields Emergency Dept., 10-24-2020 "Work/School Excuse Letter." P 481.	Rule 802-Hearsay	Excepted per 803(3),(4),(6)
15.	Franciscan Health - Olympia Fields Emergency Dept. records re: 10-24-2020 (produced by Franciscan Health in response to subpoena issued by Defendant – pages 153-191)	Rule 402-Relvance; Rule 403-undue prejudice and confusion; Rule 802-Hearsay. Further, such documents should not be admissible as a substitute for medical opinion testimony as to diagnosis, causation, prognosis, or permanency.	Relevant to damages – not unduly prejudicial or confusing; Not H/S per 801(d)(1); excepted per 803(3)-(6)

Exhibit No.	Description	Objection	Response
16.	Franciscan Health – Specialty Physicians of Illinois Olympia Fields Psychology records re: 01-21-2021 to 12-09-2021 (produced by Franciscan Health in response to subpoena issued by Defendant – pages 1-444)	Rule 402-Relevance; Rule 403-undue prejudice and confusion; Rule 802-Hearsay. Further, such documents should not be admissible as a substitute for medical opinion testimony as to diagnosis, causation, prognosis, or permanency.	Relevant to damages – not unduly prejudicial or confusing; Not H/S per 801(d)(1); excepted per 803(3)-(6)
17.	Business Records Certificate of Authenticity executed by Franciscan Physician Network Custodian of Records Carolyn Bailey 06-14-2023.	Rule 402-Relevance; Rule 403-undue prejudice and confusion; Rule 802-Hearsay	Relevant to damages – not unduly prejudicial or confusing; Not H/S per 801(d)(1); excepted per 803(3)-(6)
18.	Dr. Gordon Schulz, Psy.D., notes (various dates January 2021 to January 2022) (produced by Dr. Schulz)	Rule 802-Hearsay	Not H/S per 801(d)(1); excepted per 803(3)-(6)
19.	Tatum Work Search Records (various dates Oct. 2020 to date). P 311-393, 396-459, 488-528, 649-688.	Rule 802-Hearsay	Not H/S per 801(d)(1); D also has as a proposed trial Ex.
20.	Morgan Planning Grp. 11-02-2020 Letter to Tatum re: COBRA Notice. Def 223-225.	Rule 402-Relevance; Rule 403-undue prejudice and confusion; Rule 802-Hearsay	Relevant to damages; not unduly prejudicial or confusing; not H/S per 801(d)(2); excepted per 803(6).
21.	Morgan Planning Grp. 11-02-2020 Letter to Tatum re: Notice of Life Insurance Ending. Def 227-230.	Rule 402-Relevance; Rule 403-undue prejudice and confusion; Rule 802-Hearsay	Relevant to damages; not unduly prejudicial or confusing; not H/S per 801(d)(2); excepted per 803(6).

Exhibit No.	Description	Objection	Response
22.	Tatum Medical Records and Bills (various dates). P 81-167, 529-551.	Rule 402-Relevance; Rule 403-undue prejudice and confusion; Rule 802-Hearsay	Relevant to damages; not unduly prejudicial or confusing; not H/S per 801(d)(2); excepted per 803(6).
23.	Monarch Legal Grp. LLC Documents Oct. 2019. P 261-294.	Rule 402-Relevance; Rule 403-undue prejudice and confusion; Rule 802-Hearsay	Relevant to damages; not unduly prejudicial or confusing; not H/S per 801(d)(2); excepted per 803(6).
24.	Tatum Financial Records (various dates). P 168-201, 460-462, 626-629.	Rule 402-Relevance; Rule 403-undue prejudice and confusion; Rule 802-Hearsay	Relevant to damages; not unduly prejudicial or confusing; not H/S per 801(d)(2); excepted per 803(6).
25.	Wells Fargo Home Mortgage documents (various dates 2021-2023). P 299-310, 463-469.	Rule 402-Relevance; Rule 403-undue prejudice and confusion; Rule 802-Hearsay	Relevant to damages; not unduly prejudicial or confusing; not H/S per 801(d)(2); excepted per 803(6).
26.	Tatum Bankruptcy (NDIL BK #24-09695) Documents July 2024. P 552-618.	Rule 402-Relevance; Rule 403-undue prejudice and confusion	Relevant to damages; not unduly prejudicial or confusing.
27.	Sales contract re: sale of Tatum home Oct. 2023. P 630-643.	Rule 402-Relevance; Rule 403-undue prejudice and confusion; Rule 802-Hearsay	Relevant to damages; not unduly prejudicial or confusing; not H/S per 801(d)(2); excepted per 803(6).
28.	Def's Payroll Records 2017-2020. Def 106-180.	None.	
29.	Def's Benefits Records 2017-2020. Def 194-212, 234-239.	None.	

Exhibit No.	Description	Objection	Response
30.	Sun Life STD Payments April 2020. Def 315-318.	Rule 402-Relevance; Rule 403-undue prejudice and confusion	Relevant to damages; not unduly prejudicial or confusing.
31.	RT PTO Payout April 2020. Def 316.	Rule 402-Relevance; Rule 403-undue prejudice and confusion	Relevant to damages; not unduly prejudicial or confusing.
32.	Sale of RT Home Closing Docs – Feb 2024. P 689-691.	Rule 402-Relevance; Rule 403-undue prejudice and confusion; Rule 802-Hearsay	Relevant to damages; not unduly prejudicial or confusing; not H/S per 801(d)(2); excepted per 803(6).
33.	Defendant's 2022-2023 and 2023 and 2024 Balance Sheet and Income Statement. Def 836-839.	Rule 402-Relevance; Rule 403-undue prejudice and confusion; <i>See</i> also Defendants' Motion in <i>limine</i> No. 10.	Relevant to punitive damages; not unduly prejudicial or confusing; see Plaintiff' response to D's MIL #10.

The above list of exhibits is subject to modification based on any stipulations the parties can reach and also the Court's rulings on the parties' respective Motions *in Limine*. Plaintiff reserves the right to use any Exhibit identified by the Defendants. Plaintiff reserves the right to use and/or seek to admit into evidence other documents not identified above to refresh recollection pursuant to FRE 612 and/or in rebuttal to Defendants' case in chief. Plaintiff also reserves the right to propose additional demonstrative evidence and to use any demonstrative evidence Defendants identify and/or bring to trial.

Date: June 26, 2025

PLAINTIFF, RONALD C. TATUM

By: /s/ Timothy J. Coffey  
One of His Attorneys

Timothy J. Coffey  
THE COFFEY LAW OFFICE, P.C.  
118 N. Clinton Street, Suite 125  
Chicago, IL 60661  
(312) 627-9700  
ARDC No. 6224686  
tcoffey@worker-law.com

Heidi Karr Sleper, Esq.  
Kurtz, Sleper & Exline, LLC  
610 West Roosevelt Rd, Second Floor  
Wheaton, IL 60187  
ARDC No.  
hsleper@kselegal.com